

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION**

**UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) **CV-09-BE-2423-E**
)
)
JAMES J. STRICKER, et al.,) **UNOPPOSED
)
Defendants.)****

**MOTION TO EXTEND TIME
TO FILE RESPONSIVE PLEADING**

COME NOW, Defendants The Travelers Indemnity Company, (incorrectly named as Travelers Companies, Inc. d/b/a The Travelers Indemnity Company), and American International Group, Inc., (“Defendants”) by and through their counsel of record and respectfully move this Court to enter an Order extending the time to file responsive pleadings by thirty (30) days, and as grounds for that motion states as follows:

1. Defendants originally moved this Court on February 1, 2010 (Doc. #30) for a 60-day extension to file a responsive pleading. Defendants' motion was unopposed.

2. This Court, by Order dated February 3, 2010 (Doc. #49) granted Defendants' motion in part, ordering that responsive pleadings from these Defendants were due on or about March 5, 2010.

3. These Defendants and the United States of America are attempting in good faith to make determinations as to whether or not these Defendants should remain as parties to this litigation. Toward that end, the parties have attempted to schedule a meeting in Washington, D.C. to discuss this issue. However, due to massive snowstorms in Washington, D.C., which shut down the offices of the United States government for four days in February, as well as scheduling conflicts, the parties have not been able to meet. The parties expect to meet during the month of March.

4. Counsel for Defendants has communicated with Counsel for Plaintiff United States and Counsel for Plaintiff has agreed to the requested extension set forth in this pleading.

5. The requested extension would not materially or substantially alter the progress of the case but would, instead, meet the goals of justice and judicial economy.

WHEREFORE PREMISES CONSIDERED, Defendants Travelers Companies, Inc., d/b/a The Travelers Indemnity Company, and American International Group, Inc., respectfully request this Court to enter an Order extending the time to file responsive pleadings in this matter thirty (30) days from March 5, 2010 to April 5, 2010.

Respectfully submitted,

/s/ Augusta S. Dowd

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CERTIFICATE OF SERVICE

I hereby certify that on this _____ day of February, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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